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11 *Counsel for Defendant Beijing Matsushita*
 12 *Color CRT Co., Ltd.*

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 IN RE: CATHODE RAY TUBE (CRT)
 17 ANTITRUST LITIGATION,

Case No. 3:07-cv-5944 SC, MDL No. 1917

18 This document relates to:

19 ALL INDIRECT-PURCHASER ACTIONS,

20 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
 No. 11-cv-05513;

21 *Electrograph Sys., Inc., et al. v. Hitachi, Ltd., et*
 22 *al., No. 11-cv-01656;*

23 *Sears, Roebuck & Co., et al. v. Chunghwa*
Picture Tubes, Ltd., et al., No. 11-cv-05514;

24 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*
 25 *et al., No. 11-cv-05514;*

26 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.,*
 No. 13-cv-00157;

27 *ViewSonic Corp. v. Chunghwa Picture Tubes,*
 28 *Ltd., et al., No. 14-cv-02510.*

**DECLARATION OF RICHARD S.
 SNYDER IN SUPPORT OF
 DEFENDANT BEIJING MATSUSHITA
 COLOR CRT CO., LTD.'S
 ADMINISTRATIVE MOTION TO
 FILE DOCUMENTS UNDER SEAL
 PURSUANT TO CIVIL LOCAL
 RULES 7-11 AND 79-5**

1 I, Richard S. Snyder, do declare and state as follows:

2 1. I am Counsel with the law firm of Freshfields Bruckhaus Deringer US LLP,
3 counsel of record for defendant Beijing Matsushita Color CRT Co., Ltd. (**BMCC**) in the above-
4 captioned litigation.

5 2. I am a member of the Bars of the Commonwealth of Virginia and the District of
6 Columbia and am admitted to practice before this Court *pro hac vice*.

7 3. I have personal knowledge of the facts stated herein and, if called as a witness, I
8 could and would competently testify thereto.

9 4. I submit this Declaration in support of BMCC's Administrative Motion to File
10 Documents Under Seal Pursuant to Civil Local Rules 79-5(d) and 7-11 filed concurrently.

11 5. On November 7, 2014, BMCC filed a Motion for Summary Judgment for Failure
12 to Adduce Evidence Sufficient to State a Claim in Light of the FTAIA and for Lack of Standing
13 to Seek Injunctive Relief (**Motion**). Filed contemporaneously with the Motion was the
14 Declaration of Richard S. Snyder (**Snyder Declaration**) in support thereof, attaching Exhibits B-C
15 in support of the Motion.

16 6. Exhibit B to the Snyder Declaration is a true and correct copy of the Indirect
17 Purchaser Plaintiffs' Objections and Responses to Defendant MT Picture Display Co., Ltd.'s First
18 Set of Interrogatories (**IPP Interrogatory Responses**), including Attachment A thereto which has
19 been designated "Highly Confidential." The IPP Interrogatory Responses reference numerous
20 documents, excerpts and testimony designated by various Defendants as "Confidential" or
21 "Highly Confidential."

22 7. Exhibit C to the Snyder Declaration is a true and correct copy of a document Bates
23 labeled PHLP-CRT-087372 and designated "Confidential."

24 8. On June 18, 2008, the Court approved a Stipulated Protective Order in this matter
25 (Dkt. No. 306) (**Protective Order**). The Protective Order requires that a party may not file any
26 confidential material in the public record (§ 10). The Protective Order provides that any party
27 seeking to file any confidential material under seal must comply with Civil Local Rule 79-5 (*id.*).

6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct, and that this declaration was signed this 7th day of November, 2014, in
8 Washington, D.C.

By:

***Counsel to Defendant Beijing Matsushita
Color CRT Co., Ltd.***